

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**TAMEKA PATRICE WATERS, individually, )  
and on behalf of all other persons similarly)  
situated, )  
                )  
Plaintiff, )  
                )  
                )  
v.              )  
                ) Case No.  
                )  
LEIDOS, INC.\*\*(DE), )  
                )  
                )  
Defendant. )**

**CLASS ACTION COMPLAINT**

**PARTIES TO THIS COMPLAINT**

**A. The Plaintiff**

1. The Plaintiff, TAMEKA PATRICE WATERS, is an African-American woman, and resident of Reston, Virginia.
2. The plaintiff is a former employee of the defendant, LEIDOS, INC., as a part of an acquisition of Lockheed Martin, in Bathesta, Maryland in 2016.
3. The plaintiff was hired by LOCKHEED MARTIN on October 7, 2007. She continued to work for LEIDOS, INC. after the acquisition on August 16, 2016. While Employed as a Department supervisor, her work record was impeccable.

4. While working for Lockheed Martin, the plaintiff was responsible for the creation of the Veteran's Administration Medical Appointment Scheduling System, and had received several awards throughout her employment.
5. She maintained the same position with LEIDOS, INC. throughout the acquisition of Lockheed Martin by LEIDOS and was last receiving a salary \$180,000 per year.
6. The defendant terminated the Ms. Miller's employment formally on August 9, 2019, and her last day of work was August 23, 2019.
7. That the plaintiffs was subject to employment discrimination beginning on or about, August 16, 2016, the date of the acquisition of Lockheed Martin by LEIDOS, INC., until her forced termination from LEIDOS, INC., on August 23, 2019.

**B. The Defendant**

The Defendant, LEIDOS, INC. is a foreign Delaware Corporation, having offices globally, and conducting business both globally and domestically, including the state of Illinois.

8. LEIDOS, INC. is a covered employer, as it is engaged in an industry affecting commerce and employing over 15 employees.
9. The defendant, LEIDOS INC., is an American Defense, Aviation, Information Technology (formerly known as Lockheed Martin IS&GS), and Biomedical Research company headquartered in Reston, Virginia, that provides scientific, engineering, systems integration, and technical services. LEIDOS, INC. merged with Lockheed Martin's IT sector in August 2016 for Information Systems & Global Solutions business to create the defense industry's largest IT services provider. The Leidos-Lockheed Martin merger is considered one of the biggest transactions in the consolidation of a defense sector.

10. LEIDOS, INC. works extensively with the United States Department of Defense (4th largest U.S. Department of Defense contractor FY2012), the United States Department of Homeland Security, and the United States Intelligence Community, including the NSA, as well as other U.S. government civil agencies and selected commercial markets.

11. The defendant employed the plaintiff from August 15, 2016 to August 23, 2019.

12. The defendant intentionally terminated the plaintiff's employment on August 23, 2019, with notice given on August 9, 2019.

13. The defendant failed to stop harassment of the plaintiff during the entire term of her employment with defendant, LEIDOS, INC.

14. The defendant failed to respect FMLA and accommodations, as well as company protocol, regarding employment termination procedures and/or alternative placement within the company.

#### JURISDICTION

15. This action is brought for discrimination in employment pursuant to Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e, et seq, for discrimination based on race, color, sex and national origin.

16. Jurisdiction over the statutory violations alleged is conferred as follows: for Title VII claims by 28 U.S.C. § 1331, 28 U.S.C. § 1343(a)(3), and 42 U.S.C. § 2000e-5(f)(3); and 24 U.S.C. § 1981.

17. The plaintiff has filed a charge with the EEOC on April 4, 20202, (EEOC Charge No. 570-2020-01573), and was issued a right to sue letter on September 19, 2020, in which she received on September 27, 2020. A copy of the charge is attached hereto as "Exhibit A."

18. Venue is proper in that Defendant maintains a business presence in Chicago IL, an allegations of this class action that LEIDOS, with over 40,000 employees, has discriminated against African Americans and locations throughout the United States, all of whom the plaintiff brings on behalf on earth as individual and putative class representative

**EXAUSTION OF ADMIISTRATIVE REMEDIES**

19. On September 27, 2020 the plaintiff received a dismissal and Right to Sue notice from the EEOC given 90 days to file a lawsuit with this Court.

**STATEMENT OF FACTS**

**20. SEE ATTACHED AFFIDAVIT OF TAMEKA PRICE WATERS, as "Exhibit B."**

**ADDITIONAL FACTUAL INTFOMATION**

21. Ms. Waters is currently interviewing for various job positions in the Chicago Illinois, metropolitan area. She was born and raised in Chicago and attended school through her completion of college in the Chicago/Cook County area. Her family and many friends reside in Chicago, she intends on residing in Chicago in the very near future once gaining employment.

22. This action is brought on her individual behalf, and on behalf of those similarly situated who have suffered racial discrimination by this particular government contractor (LEIDOS, INC.). The Plaintiff lost her dignity as an educated and accomplished woman, loss of self-esteem, pride, her family's pride, loss of her house located in an upper middle-class neighborhood of Virginia. Additionally, she was forced to file bankruptcy as a result of her termination, she has suffered the inability to sleep, and physical and

mental anguish. She continuously needs and receives medical and psychiatric support, as well constantly suffers from exhaustion and depression, shame, and pain and suffering. All of this being a result of her discrimination by the defendant for being an African American woman.

23. The plaintiff, who holds a master's degree in business administration, prided herself on the hard-earned respect, all of which has been stolen from her. This is something that cannot be purchased, learned, gifted, nor replaceable. Since her termination, she has suffered such depression that leads to her often considering her lack of worthiness to continue, and what is now her struggle to keep on living.

24. On information and belief, the plaintiff is aware of numerous employees of LEIDOS, INC. who are African American, both men and women, but more women, who, like the plaintiff, have been terminated (or forced to resign) due to the widespread racial and sexual discrimination, in locations owned or controlled by Leidos. These employees, who were similarly situated to the plaintiff, were former employees of Lockheed Martin, and all with long term solid employee profiles who were terminated or forced to retire from LEIDO employment—particularly since the election of President Trump in 2016.

25. On information and belief, LEIDOS, IINC., together with numerous of its executives, officers, supervisors, directors, at one time or another during the year 2015 up to and including the present time, have personally donated large amounts of cash checks, money orders and other items of value directly to Trump administration, and or publicly known organization supporting the Trump administration for President for both elections in 2016 and 2020.

**CAUSES OF ACTION**

**COUNT 1-VIOLATION OF THE CIVIL RIGHTS ACT OF 1964**

26. Plaintiff and putative class plaintiffs realleges paragraphs 1-25 as fully pleaded herein.
27. Plaintiff is in a protected class as she is an African American woman.
28. The plaintiff was denied equal opportunity because of her race and sex.
29. Defendant is a covered employer under 42 U.S.C. § 2000e(b) as it is a limited liability company is a “person” under the Act, as LEIDOS, INC., is an employer of at least 15 employees for each working day for 20 or more calendar weeks in the current or preceding calendar year.
30. That the plaintiff was terminated from her employment as a result of the discrimination.
31. The plaintiff suffered unequal terms and conditions of her employment.
32. The plaintiff suffered wrongful termination, retaliation, along with racial harassment and loss of employment.
33. As a direct and proximate result of the wrongful conduct of the defendant, the plaintiff has suffered loss of income, emotional distress and mental anguish, attorney’s fees, and injury to his professional reputation.

**CLASS ALLEGATIONS PURSUANT TO FEDERAL RULES OF CIVIL PROCEDURE 23**

**Plaintiffs’ Case:**

34. This action is predicated upon Rule 23 of the Federal Rules of Civil Procedure as follows:
  - a. The members of the classes are so numerous that joinder of all members is impractical.

- b. While the exact number of class members is presently unknown. The exact number of class members can only be ascertained through appropriate discovery.
- c. Plaintiffs' claims arise from the same policies and courses of conduct on the part of defendants' and plaintiffs' claims are based on the same legal and remedial theories as each of those of the proposed class they represent and involve identical factual circumstances.
- d. Further, the injuries suffered by Plaintiffs are similar to the injuries suffered by putative class members, and Plaintiffs seek common forms of relief for themselves and members of the classes they represent, including injunctive and declaratory relief, lost wages, and economic damages.
- e. There are questions numerous of law and fact and are common to all of the alleged putative class plaintiffs and putative subclass plaintiffs, and as to the alleged putative defendant classes.
- f. The claims of the representative parties are typical of the claims and defenses of the putative classes and subclass members. The same is true as to the named putative defendant classes.
- g. The representative parties will adequately protect the interest of the classes as they are.
- h. That the relief sought is exemplified, for example, all named plaintiffs and putative class plaintiffs, is injunctive, temporary, and permanent, treble damages, punitive damages, compensatory damages, and injunctive relief. All of

the relief both equitable and common applies to all named and putative classes of plaintiffs.

35. The questions of law and fact that are common to class members predominate over any questions affecting only individual members, and a class action is far superior to other available methods for fairly and efficiently adjudicating the controversy for both the Court and the Parties, both named and putative class plaintiffs.

36. The putative named plaintiff classes, together with that of the putative defendant classes if certified as such, will greatly assist this Honorable Court and the parties in the manageability of the case.

PRAYER FOR RELIEF

WHEREFORE, the plaintiff respectfully request judgment against the defendant for compensatory damages, future and past pain and suffering, loss of enjoyment of life, loss of income, loss of future job opportunities, injunctive relief the differences in amount of the breach of contract, punitive damages, attorneys fees and costs and any other remedy this Court feels is fair and just. In addition, the plaintiff and putative class plaintiffs respectfully requests that this Honorable Court certify this case as a class action.

PLAINTIFF DEMANDS A TRIAL BY JURY

Respectfully Submitted

/s/ Robert A. Holstein

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